

CHRONOLOGY OF FRANK J. DOYLE & SONS TRANSFORMERS

- A PCB Inspection was conducted on 8/30/83. At the time of the inspection, the facility had 150 transformers, 100 empty casings transformer parts and 1-500 gallon and 1-900 gallon storage tanks. No PCB records of transactions were kept. Five samples were collected (2 from oil tanks and 3 soil samples from various areas of the site). One oil sample, from a 500 gallon tank, contained 82 ppm PCB and one soil sample from the SW. corner of the lot, contained 61 ppm PCB. Based on pictures taken during the time of the inspection, visible oil stains were seen at the site. In addition, no fence was around the facility. The facility had been in operation since about 1979.
- On January 25, 1984 a Civil Complaint was issued to the facility for failure to mark the 500 gallon tank, failure to prepare and implement an SPCC plan and failure to keep batch records for the 500 gallon tank. The total proposed penalty was \$3,000. This matter was settled with a CA/CO on May 3, 1985, where the Respondent paid a final penalty of \$50.00, based on inability to pay.
- On September 28, 1990 the EPA Emergency Response Branch (ERB) Technical Assistance Team (TAT) performed a site assessment at the facility in response to a citizens complaint concerning the improper handling and salvage of transformers. This complaint originally came into the EPA TSCA program and it was referred to ERB. The purpose of the 9/28/90 site visit was to perform PCB screening of oil and soil using CHLOR-N-OIL (TM) AND CHLOR-N-SOIL (TM) test kits. TAT observed 1-500 gallon tank, 1-900 gallon tank and 14-55 gallon drums that were being used for storage of transformer oil. Both tanks and all the 55 gallon drums were filled to capacity with transformer oil. Stored onsite were approximately 200-300 transformers to be salvaged. Two oil samples and three soil samples were collected and screened. One soil sample of a stained area at the northeast corner of the site and two oil samples from the 900 gallon storage tank and a 55 gallon drum all tested positive for PCBs above 50 ppm.
- On October 12, 1990 a PCB inspection, in addition to further sampling by the TAT, were conducted at the site. Of the 14-55 gallon drums that were present at the site on 9/28/90, only one drum contained oil. Both of the 900 and the 500 gallon tanks had been drained of oil and were in the process of being refilled. Again the TAT screened oil samples from transformers and the tanks. Fourteen samples were screened and five samples of the fourteen were sent for analysis. Two sweep samples were taken from the transformer dismantling building at unbiased locations. Two wipe

samples were collected from the kiln located in the dismantling building for PCB and dioxin analysis. Offsite grab surface samples were collected at the Doyle residence, (b) (6) residence, drainage pathways adjacent to the site and drainage pathways in the school yard. A background grab surface soil sample was collected from the school practice field. All samples were collected for PCB analysis and two samples (b) (6) residence and school yard) were collected for dioxin analysis. Offsite wipe samples were collected at the Doyle residence, (b) (6) residence, and at the school building for dioxin analysis.

All samples analyzed for dioxin were non detect. Three sample sites contained PCBs greater than 50 ppm. Those were the Salvage Yard- North grid (89 ppm), Salvage Yard- South Grid (71 ppm) and the drainage pathway south of the site (280 ppm).

It was determined during this inspection that Mr. Doyle bought used transformers from only four sources, which were Southwestern Electric Power Co. (SWEPCO), City of Garland, Texas, Louisiana Power & Light and Public Service of Oklahoma. He had a heat cleaning oven for drying and removing transformer core residue to simplify removal of copper. The oven had a Texas Air Control Board permit. All of the scrap metal was sold to McKinney Metals. All transformer oil was sold to Scoggins Oil Co., Sallisaw, Okla.

- On 7/26/90 a PCB Inspection was conducted at McKinney Metals, McKinney, Texas. Based on the inspection findings, it was determined that Frank Doyle is the primary supplier of transformer cans and burned windings. Frank Doyle did not supply certifications or test results with this equipment. A sample was taken at the prepared ferrous and shearing area, where earlier that day several empty transformer cans had arrived from Frank Doyle. This sample contained 86.3 ppm PCB.

- On April 19, 1991 the TAT went back to the site to collect further samples from the drainage ditch. Four composite and one grab sample was taken for PCB analysis. Three of the samples contained PCBs in excess of 50 ppm (58 ppm, 271 ppm and 166 ppm). The ERB referred this case back to TSCA in July, 1991.

- On September 7, 1994 a PCB Inspection was conducted at the facility. At the time of the inspection, the facility had 11 drums of brass material, 91 drums of scrap metal, 751 empty transformers and 3 oil storage tanks (2-500 gallon and 1-275 gallon) at the facility. The transformers are now mainly purchased from Louisiana Power & Light and SWEPCO. The oil is still sold to John Scoggins and the scrap metal is sold to McKinney Metals. Four samples were taken during the inspection for PCB analysis. One soil sample taken from outside the fence in a drainage pathway between the fence and the road across the street from the school contained 11.8 ppm PCB.

- On January 25, 1995 a letter was sent to Mr. Doyle informing him of the PCB contamination at his site and soliciting his intentions in regards to characterization and, if appropriate, cleanup.
- On February 15, 1995 Worldwide Reclamation, contractor for Mr. Doyle, obtains surface samples of the site. This contractor does not consult with EPA before obtaining samples. All sample results were non-detect.
- On March 9, 1995 EPA conducts a site visit to meet with Mr. Doyle and Worldwide Reclamation to discuss further sampling of the site.
- On May 23-24, 1995 Worldwide Reclamation conducts sampling at the site. The number of samples taken during this time was restricted based on Mr. Doyle's financial status.
- On June 21, 1995 a meeting is held at the Frank Doyle site to discuss the sampling results and to discuss the need for a timely remediation response. Mr. Doyle was given until 6/27/95 to decide whether he was going to take responsibility for the cleanup.
- On June 27, 1995, based on a phone conversation with Mr. Doyle, he stated that he could not take responsibility for remediation efforts based on inability-to-pay.